

Exhibit A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
72634552 CORP.,

Index No. 11503/2013

Plaintiff,

-against-

AFFIDAVIT

183 LAFAYETTE AVE. LLC, LUCELENIA REYNOSO,
LUZ M. OQUENDO, ESPERANZA O. OQUENDO, PABLO
J. OQUENDO and JOHN DOES 1-10,

Defendants.
-----X

State of New York)
County of Kings)

PABLO OQUENDO, being duly sworn, deposes and says:

1. In 1964, when I was 33 years old, I moved to 183 Lafayette Avenue, Brooklyn, New York 11238 (the "Property") and rented from the prior owner. In January 1979, I agreed to purchase the Property from the prior owner and paid for it in all cash.

3. When I purchased the Property in 1979, I was 48 years old and had nine children that resided with me. I paid the full purchase price for the home. However, when I purchased the Property, my wife Luz Oquendo and I decided to place title to the Property in the name of all nine children. I was very ill, and afraid I would not survive.

4. Since I don't speak English, I asked my oldest child, Lucelenia Reynoso ("Lucy"), to assist me with the purchase process. For reasons not clear to me, the deed was placed solely in Lucy's name at the closing. Lucy agreed to transfer the deed to all of her siblings at a later date. We agreed that when my wife and I passed away, the Property would be sold and the proceeds shared equally among the children.

5. My family and I made repeated requests for Lucy to transfer the deed since that time. My wife and I have continued to reside in the Property since that time. Since 1979, I have paid all of the costs and expenses and repairs for the Property. Lucy has not lived in the Property since 1979, since she married at a young age.

6. At the present time, the only two children that reside with me are Carlos and Esperanza Oquendo.

7. I first learned that Lucy sold the Property in or around September of 2013 when a man approached my daughter Esperanza and told her he bought the Property. She asked him how that was possible, since I hadn't sold it, and he told me signed a contract with Lucy. I questioned Lucy repeatedly about what was going on, and she told me she did not sell the house. When we received legal papers a few months ago, Lucy told me that her lawyer would take care of everything.

8. I have been told that Lucy transferred the Property to a corporation she created and sold it for \$600,000. A real estate broker told me it is worth between \$1.2 million and \$1.5 million dollars.

9. I can't believe that my own flesh and blood has stolen the only home I have had since 1964, and the only property my family owns, and sold it for herself. To make matters worse, the new owners are trying to throw my wife and I out on the street. I trusted my daughter Lucy to take care of the Property for me and my family and she has lied to me and my family and betrayed me. She will no longer return my calls.

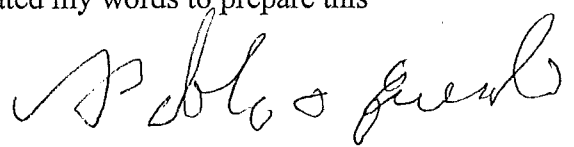
10. I am 82 years old and my wife is 81 years old. I have a third grade education and my wife has a seventh grade education. I have severe coronary heart disease, I am missing an

eye, I am 50% blind in the other eye, and I suffer from bronchial asthma. My wife has spinal cord injuries and uses a respirator.

11. I did not answer the complaint or appear in this action because I truly did not understand what was going on until I was able to hire a lawyer this week. Lucy has made repeated representations to me that she was taking care of everything and I did not need a lawyer. In fact, she told me she didn't sell the Property. I didn't learn that the Property was sold until I received legal documents, and she told me again not to worry about it. These are some of the many lies she told me and my family.

12. I have never, in my life, had to hire a lawyer to defend myself against a family member. I did not do so sooner because I could not believe that my daughter would lie to me and permit me to be thrown out on the street. I made numerous requests to Lucy to transfer the deed, as agreed, and she always put me off. I relied on her representations that she would do so in the future because I trusted her. She led me to believe that she would transfer the Property, and I relied on this representation. I am heart-broken to learn that she lied to me and my family.

13. Since I do not speak English, my attorney translated my words to prepare this affidavit.



Pablo Oquendo

Sworn to me this ^{4th} 24 of December of 2013

